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September 23, 2022

By ECF Only

Honorable Katharine H. Parker, U.S.M.J.
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl St., Courtroom 17D
New York, New York 10007

Re: *Graham Chase Robinson v. Canal Productions, Inc. et al.*
Civil Action No. 1:19-cv-9156 (LTS) (KHP) (the "Action")

Dear Judge Parker:

This firm represents defendant Canal Productions Inc. ("Canal"), along with Traub Lieberman Straus & Shrewsbury LLP serving as co-counsel for Canal and counsel for defendant Robert De Niro (collectively, the "Defendants").

We submit this letter on behalf of the Defendants and jointly with counsel for plaintiff, Graham Chase Robinson ("Plaintiff"), to request a two (2) day extension of time (from September 28) until September 30 to jointly propose a summary judgment briefing schedule (as directed by the Court's September 21, 2022 Order. (ECF #264).

Counsel are in discussions about the resolution of certain pending causes of action without the need for motion practice. Owing to holiday and travel schedules, and client availability, the additional two (2) days will best enable us to do so productively.

No other modifications to any dates set by the Court are impacted by this request.

Respectfully submitted,

TARTER KRINSKY & DROGIN LLP

/s/ Laurent S. Drogin and
/s/ Brittany K. Lazzaro

cc: All counsel of Record (via ECF)